



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

Order Instituting Rulemaking Into)	Rulemaking 04-12-001	04-23-07
Implementation of Federal Communications)	(Filed December 2, 2004)	01:52 PM
Commission Report and Order 04-87, As It)		
Affects The Universal Lifeline Telephone Service)		
Program.)		

**COMMENTS OF COX CALIFORNIA TELCOM, LLC, DBA COX
COMMUNICATIONS, ON THE PROPOSED DECISION OF ALJ JONES: DECISION
ADOPTING STRATEGIES TO IMPROVE THE CALIFORNIA LIFELINE
CERTIFICATION AND VERIFICATION PROCESSES, AND REINSTATING
PORTIONS OF GENERAL ORDER 153**

Douglas Garrett
Cox Communications
2200 Powell St., Suite 1035
Emeryville, CA 94608
T: 510.923.6222
E: douglas.garrett@cox.com

Esther Northrup
Cox Communications
5159 Federal Blvd.
San Diego, CA 92105
T: 619.266.5315
E: esther.northrup@cox.com

Margaret L. Tobias
Mandell Law Group, PC
Three Embarcadero Center, Sixth Fl.
San Francisco, CA 94111
T: 415.869.6772
E: mtobias@mlawgroup.com
Attorney for Cox Communications

Dated: April 23, 2007

I. Introduction.

Pursuant to the Commission's Rules of Practice and Procedure, Cox California Telecom, L.L.C., *dba* Cox Communications (U 5684 C) ("Cox") submits these timely comments on the Proposed Decision of Administrative Law Judge Jones, dated April 3, 2007 ("Proposed Decision" or "PD"), which includes the Report on Strategies to Improve The California Lifeline Certification and Verification Process, dated April 2, 2007, as Attachment A ("Staff Report").

Cox commends the Commission and the Staff for developing a comprehensive response to the multitude of issues that face Lifeline subscribers, Solix (i.e. CertA) and carriers with respect to the new Lifeline Program requirements. Modifying California's Lifeline Program to be consistent with the Federal Communication Commission's ("FCC") universal service program is without a doubt a considerable undertaking. And while unanticipated problems unfortunately arose, the Commission and Staff have worked diligently with Solix and carriers to develop both short-term and long-term solutions to such problems. As demonstrated in the Staff Report, Staff has obtained and synthesized input from various sources to develop solutions that improve the California Lifeline Program, and thereby, the Lifeline subscribers.

Cox generally supports the recommendations in the Proposed Decision and Staff Report and offers the following comments in an effort to further improve them, and thereby, the Lifeline Program.

II. The Commission Should Tentatively Adopt the Proposed Time Line But Delay Incorporating It Into General Order 153 Until It Resolves Phase 2 Issues.

After implementing the new Lifeline Program rules in July 2006, the Commission recognized late last summer that the verification response rate was lower than expected. The PD recognizes that the response rate for both certifications and verifications is still much lower than expected and the Staff Report contemplates that a number of factors contributed to the low response rate. In diagnosing the problem, the PD reports that there is a significant delay between the date that Solix sends certification and verification forms (collectively, "Forms") to applicable subscribers and such subscribers actually receive such Form. Using "standard" mail, it takes approximately 8-14 days for mail to reach Lifeline customers.¹ This delay at the beginning of the enrollment/verification process has a domino effect and creates further delay throughout the certification/verification process. The initial delay decreases the likelihood that subscribers will return the Forms. Under the existing schedule set forth in General Order ("GO") 153, Attachment 1, Lifeline subscribers must return the Forms within 30 days from the date such

¹ PD, p. 9.

forms were mailed. Certainly, if Lifeline subscribers do not receive the Forms in a timely manner, it will be especially difficult for them to comply with this requirement.

The PD proposes extending the 30-day time period within which Solix must receive verification and certification forms from subscribers. Cox does not oppose temporarily extending the period of time that Solix has to process responses, as the extra time will hopefully result in a higher response rate. But Cox wishes to identify potential problems with the extended time line. Extending the time Solix has to accept certifications and verifications will undoubtedly increase the amount that carriers will be required to backbill their subscribers that eventually do not qualify for the Lifeline Program. Under the existing time frame, a carrier enrolls a subscriber and transfers that data within one day of enrollment to Solix. After a short-period of time, Solix then prepares and sends out the applicable Form to the subscriber. Solix rejects a subscriber if she does not certify or verify within an approximate 30-45 day window from the date it mailed the applicable Form. Thereafter, Solix transmits data for disqualified subscribers to a carrier. And the carrier then re-grades service on the next monthly bill. In practice, there may be additional delays or fluctuations in the above-mentioned schedule and this means that carriers may be required to backbill customers for 60 or more days.

Under the proposed process, the Commission would extend the time for certification/verification to 45 days with an 8-day grace period and a 7-day period for the Cert A to finalize review and lists of qualified and disqualified customers to carriers.² Thereafter, carriers will need to discontinue Lifeline service, re-grade the customer to regular service and backbill the customer for discounts previously received. From the date the subscriber first enrolls with the carrier to the time that the carrier has the data to re-grade the customer's service could take as long as or longer than 90 days.

This is problematic for two reasons. First, a longer back-billing period directly impacts subscribers and it will likely be difficult for them to pay larger-than-expected backbilled amounts, as well as the regular service fees on a going forward basis. This will result in more calls to the carrier's customer service centers, and thereby, increasing the carrier's costs. Second, in California, carriers may only backbill for a period of 90 days,³ and this limitation is found in most carriers' tariffs. To the extent that the new schedule results in carrier's backbilling for Lifeline-related charges for a period of more than 90 days from when a subscriber first enrolls for Lifeline service, the Commission should expressly allow carriers to claim lost revenues associated with such delays in processing.

² Staff Report, Attachment 1, p. 49.

³ See D.86-12-025.

Cox agrees that the Commission should temporarily extend the schedule as proposed in the PD, but Cox strongly recommends that as part of the long-term strategy the Commission consider using first-class postage on Lifeline mailings. Cox understands that Solix sends Lifeline mailing as standard (i.e. bulk-mail that is not pre-sorted), instead of using first-class postage. Both the PD and the Staff Report recognize that using “standard” postage results in 8-14 day delivery to Lifeline subscribers and is a “significant factor in untimely receipt of Lifeline forms from customers and resultant denials.”⁴ The PD also reports that “standard” mail does not guarantee delivery to addressees or that undelivered mail is returned to Solix.⁵ Requiring first-class postage would increase the cost of Lifeline mailings, but such increased postage costs would likely be offset by savings in other areas. For example, Cox submits that subscribers would timely receive Lifeline mailings and would be more likely to open a mailing with first-class postage, as compared to bulk-mail postage. Subscribers that timely receive their Forms would likely be more inclined to promptly complete and return the Forms. To the extent the initial response improves, Solix will incur fewer costs because it will have fewer subscribers to contact via automatic-dialing messages and written reminders. And a higher initial response rate could mean fewer disqualifications, and thereby, fewer appeals which would decrease both the Commission’s and carriers’ costs, respectively.⁶

The PD identifies mechanisms to obtain faster guaranteed delivery of Lifeline Program materials in Phase 2,⁷ and Cox supports this finding. To the extent the Commission finds a way to shorten delivery time, it may not wish to make permanent the extended schedule set forth in the PD. Accordingly, the Commission should adopt the extended schedule on a temporary basis and it should consider incorporating the extended schedule into GO 153 only after Phase 2 issues have been addressed.

III. Carriers Should Not Be Required To Send Out Reminders To New Subscribers.

Cox appreciates the various and creative options that Staff has generated and considered in an effort to increase Lifeline subscriber rates. While Cox supports a requirement that carriers sent out a one-time post card informing existing Lifeline customers about the new verification process, Cox strongly urges the Commission to re-consider the proposal to amend GO 153 to require carriers to send out written communications concerning the Lifeline Program to new

⁴ Staff Report, p. 18.

⁵ PD, p. 9.

⁶ The PD notes that 12,400 appeals have been processed and 4,000 are still pending. PD., p. 19. Reducing the number of appeals will reduce the tremendous amount of resources, such as dealing with increased call volumes, call duration and written appeals, CAB has been required to marshal in response to both complaints and appeals. PD., p. 20.

⁷ PD, O.P. No. 5.

customers on an on-going basis. Specifically, the PD adopts the Staff Report's recommendation that carriers send new subscribers a reminder to return their certification forms in a timely manner.⁸ This proposed requirement runs contrary to the Commission engaging a third-party to serve as the CertA and the CertA serving as the sole contact for customers with respect to the Lifeline Program. Requiring carriers to send out confirmation letters will cause confusion in a process that the Commission is attempting to clarify and improve. The low response rate resulted, in part, because customers were not familiar with Solix and they found it difficult to get assistance from Solix.⁹ This in turn caused customers to contact their carriers directly, but carriers did not have access to the information necessary to respond to the inquiries. However well intended, requiring carriers to send out written communications concerning Lifeline will create confusion and cause customers to contact their carriers instead of Solix. This is problematic for carriers because it unnecessarily burdens their call centers. It is also problematic for subscribers seeking answers because the carrier's representative will not have information necessary to respond to the customer's inquiry. As discussed below, carriers have very limited information about a given customer's status in the Lifeline Program, and therefore, customers should not be encouraged, either directly or indirectly, to call their carrier while their certification is pending.

Requiring carriers to send out written communications to Lifeline subscribers defeats the purpose of having the CertA serve as the contact for the Lifeline Program. The PD notes that when carriers were administering the Lifeline enrollment for their customers, they achieved response rates of 70%.¹⁰ While a number of factors contributed to that rate, a key element was certainly the established relationship between the carrier and the customer. It is important for Lifeline subscribers to now establish a relationship with the CertA. Once the carrier completes the enrollment process, correspondence from the CertA should promptly follow and it would be counter-productive for the carrier to conduct any additional outreach to the customer.

Approximately six months have passed since the Commission suspended portions of GO 153 and Lifeline subscribers continue to receive communications about Lifeline from Solix.¹¹ Re-introducing communications from the underlying carrier will only cause customers to be confused

⁸ PD, p. 16.

⁹ Assigned Commissioner's Ruling Temporarily Suspending Portions of General Order 153 Relating to the Annual ULTS/California Lifeline Verification Process, p. 3., dated November 6, 2006.

¹⁰ PD, p. 3.

¹¹ Some carriers may voluntarily elect to provide written communications with their subscribers because it is consistent with their approach to customer service and the type of call center infrastructure they have deployed. The Commission should not prohibit carriers who wish to undertake such communications voluntarily but it should not require it of all carriers.

about who they should call. This is true even if the letter makes clear that Solix administers the program and directs subscribers to call Solix. Cox, therefore, recommends that the Commission not require carriers to send out reminder notices to their Lifeline subscribers.

IV. Solix Should Be Required to True-Up Its Data With Carriers On A Monthly Basis.

During the first three months of the new Lifeline Program, Solix worked with a few carriers to true-up information contained in their respective databases. Due to constrained resources, Solix understandably stopped providing this true-up information. The Staff Report states that since last summer carriers have not had an opportunity to reconcile their database records with those of Solix.¹² To address this problem, the contract amendment with Solix requires Solix to provide “a one-time true-up and the customer activity report in the Daily Return Feed.”¹³ And the Staff Report states that Staff will evaluate whether more true-ups will be needed. Cox cannot emphasize enough the importance of the true-up process and recommends that the true-up take place on a monthly basis.

A monthly true-up process will greatly assist carriers in administering the Lifeline Program, as well as help customers that do call their carrier with inquiries about their status in the Lifeline Program. Solix provides daily updates to carriers but these are limited to transactional information that allows Cox to see only a portion of the Cox customers included in the Solix database, at any given point in time. The true-up process will ensure that both Cox and Solix have complete and accurate information about Cox customers. For instance, through the true-up process, Cox would be able to identify any mismatches concerning a customer’s name, address or carrier account information. A monthly true-up process would allow all carriers to effectively audit their own systems and identify potential database or program administration problems of which it would not otherwise be aware.

Cox recommends that the PD be revised to require Solix to provide a monthly true-up with each carrier.

V. Long-Term Strategies and Future Changes to General Order 153.

The long-term strategies for implementing of the Lifeline Program include (a) requiring the Implementation Working Group and the Marketing Working Group to continue to meet; (b) keeping this rulemaking so that parties may identify and implement additional issues related to the Lifeline Program; and (c) permitting Staff to utilize the resolution process to make changes to GO 153.

¹² Staff Report, p. 22.

¹³ Id.

Cox submits that the weekly working groups meeting have been successful and largely addressed the issues identified in the ACR, among others.¹⁴ Cox agrees that all interested parties will benefit from on-going meetings but recommends that such meetings be held on a monthly basis, as compared to weekly.¹⁵

Cox also supports the PD's finding that the Commission should keep this docket open so that Staff, carriers and other interested parties may identify and implement long-term strategies.¹⁶ In addition to issues identified in the PD, Cox recommends that the Commission investigate whether it is appropriate to use first-class postage for the Lifeline Program. As discussed above, utilizing first class postage may remedy other problems occurring throughout the certification and verification cycle. When carriers administered the Lifeline Program for their customers, carriers that utilized first-class postage on written correspondence with subscribers recovered those costs from the program. Utilizing first-class postage now should not result in a new cost being recovered from the Lifeline fund.

In response to Staff's request for authority to make additional changes to the General Order, the PD authorizes Staff to use the resolution process to present changes to General Order 153. Cox recommends the Commission not authorize Staff to utilize the resolution process for making modifications to General Order 153. Cox agrees that Staff should have the flexibility to work with carriers to reach consensus on the implementation of necessary, operational changes. Through both the Implementation Working Group and the Marking Working Group, Staff has done a good job in working through complex issues relevant to implement GO 153. Indeed, the Commission is considering a number of Staff recommendations as part of the PD, as discussed herein.

Any given Staff recommendation that would modify GO 153 may have a significant impact on one or more interested parties and the Commission should consider such changes only as part of the rulemaking process. For example, the Lifeline Program time-frame is a key element in increasing return rates, but it also impacts other issues as discussed above. Changing the schedule as set forth in the PD is a discretionary task and should be reviewed via the rulemaking process. To the extent a change in the Lifeline Program is significant enough to modify GO 153, the Commission should adopt such change via the rulemaking process.

¹⁴ See, PD p. 18.

¹⁵ That being said, Cox recognizes that the PD need not address the frequency of the meetings and the participating parties can determine the frequency, as applicable.

¹⁶ PD, p. 21.

VI. Conclusion.

Cox supports the efforts and progress that the Staff and the Commission have made in identifying solutions concerning implementation of the Lifeline Program. As discussed herein and as set forth in revised findings of fact, conclusions of law and ordering paragraphs in Exhibit A, Cox recommends that the Commission:

- Adopt, on a short-term basis, the revised schedule in the PD and re-consider such schedule as part of Phase 2 issues;
- Not require carriers to send out reminder notices to their Lifeline customers as this would create customer confusion and increase carrier costs;
- Continue Phase 2 of this rulemaking to consider using first-class postage on Lifeline mailings, other issues identified in the PD and any other issues that interested parties may identify in this comment cycle;
- Direct interested parties to continue participating on the Implementation Working Group and Marketing Working Group meetings; and
- Require any changes to General Order 153 be made via the rulemaking process.

Dated: April 23, 2007

Douglas Garrett
Cox Communications
2200 Powell St., Suite 1035
Emeryville, CA 94608
T: 510.923.6222
E: douglas.garrett@cox.com

Esther Northrup
Cox Communications
5159 Federal Blvd.
San Diego, CA 92105
T: 619.266.5315
E: esther.northrup@cox.com

Respectfully submitted,

/s/

Margaret L. Tobias
Mandell Law Group, PC
Three Embarcadero Center, Sixth Fl.
San Francisco, CA 94111
T: 415.869.6772
E: mtobias@mlawgroup.com
Attorney for Cox Communications

Exhibit A
Cox Comments on Proposed Decision of ALJ Jones

Findings of Fact

1. Many LifeLine recipients complained that they received their certification or verification notices too late to respond.
2. With standard mail, there is no guaranteed delivery, nor return to sender.
3. Standard mail, standing alone, is not satisfactory in a program based on time-sensitive, short-deadline mailings.
4. The proposed modifications to Appendix E of GO 153 are a key element in improving the response rates for both certification and verification.
5. The low response rate is multi-faceted, so the resolution will be multifaceted as well.
6. Staff needs to be informed of system problems — especially any that impact LifeLine customers — within 48 hours of when they are discovered.
7. Staff has identified problems that will require solutions beyond those that can be implemented in the short term.
8. Administration of the Lifeline Program, and thereby Lifeline subscribers, will benefit from Solix and carriers conducting a database true-up on a monthly basis.
9. Modifying any portion of the schedule set forth in GO 153, Attachment 1 without opportunity for comment may have unintended consequences on interested parties.

Conclusions of Law

1. In light of the problems with standard mail, it is critical that customers have additional time to respond.
2. In order to respond quickly to problems, staff will continue to have authority to authorize implementation and marketing changes to the Lifeline Program. Staff should make use of the resolution process for such changes. Staff-proposed changes to GO 153 should be considered as part of the rulemaking process. ~~to present further changes to the GO for Commission approval.~~
3. Since there is insufficient time for the customer to respond, we temporarily extend the timeline for receipt of certification and verification forms should be revised by issuing to a “soft” denial on the 45th day, instead of the outright denial in the current process. The Commission will consider making the extension permanent as part of Phase 2 of this rulemaking.
4. The additional reminders and notifications included in the contract amendment should encourage LifeLine customers to complete and return the required forms.
5. Staff should have the authority to interpret what specific documents can be included under the catchall phrase: “Other official document,” with the caveat that the document in question should be one the purpose of which is to verify or establish income.
6. Carriers should not be required to send the reminder materials to new LifeLine customers. In conjunction with the re-implementation of the verification process, carriers should send

correspondence to their existing Lifeline customers informing them of the new Lifeline verification process.

7. Solix should identify and rectify problems impacting LifeLine customers as quickly as possible.
8. The contract modification described in the Staff Report should help to increase the response rates.
9. The steps outlined by staff under their short-term strategies will help to increase response rates.
10. The suspension of those portions of GO 153 suspended in the November 1, 2006 ACR, as modified by D.06-11-017, should be lifted.
11. Some long-term strategies may require a more formal review than that of the resolution process.
12. Commission staff should ensure that Solix is in compliance with its contract and any subsequent amendments.
13. Solix should be required to provide monthly database true-ups with participating carriers.
14. If the process of denying a Lifeline subscriber takes more than 90 days, carriers may either recover any amounts owed beyond the 90 days from the ULTs fund or collect such funds from the subscriber.

ORDER

Therefore, **IT IS ORDERED** that:

1. The proposed changes to Appendix E of General Order 153 that appear in Attachment 1 of “Report on Strategies to Improve the California LifeLine Certification and Verification Processes” shall be adopted temporarily until revised or made permanent as part of Phase 2 of this proceeding.
2. Staff is authorized to use the resolution process to present further changes to the Lifeline Program that do not modify General Order 153. ~~for the Commission’s consideration.~~
3. General Order 153 shall be modified to include the proposed additional reminders and notifications to customers.
4. Staff is authorized to interpret what specific documents can be included under the catchall phrase: “other official documents.” However, the documentation in question shall be one from a government agency or court the purpose of which is to verify or establish income.
5. The Communications Division shall explore mechanisms for faster guaranteed LifeLine mail delivery.
6. All telecommunications carriers subject to the provisions of General Order 153 shall send correspondence to existing LifeLine customers informing them of the new LifeLine verification process. The correspondence will be sent to coincide with the re-launch of the verification process and shall be administered by the Implementation Working Group. ~~Carriers shall also send reminder materials to new LifeLine customers.~~

7. General Order 153 shall be modified to add Section 4.1.3 set forth in Attachment 6 of the Staff Report and as modified by this order. ~~as it appears in Attachment 6 of the Staff Report. Section 4.1.3 requires carriers to send reminder notices to new LifeLine customers.~~

8. The assigned Commissioner shall work with the Communications Division and Solix to ensure timely implementation of measures to correct future problems with the LifeLine processes.

9. We lift the suspension of the following sections of General Order 153 which were suspended in the November 1, 2006 assigned Commissioner Ruling, as modified by Decision 06-11-017: Section 4.5, including Appendix C; 5.5; those portions of 6.3 and 6.4 as they relate to the annual verification process; 8.1.3 as it relates to customers who have not responded to the annual verification notice or returned it late; Appendix C; and the portion of Appendix E titled "Existing ULTS Customers (Verification)." Those sections of General Order 153 shall be reinstated immediately, as of the date of this order.

10. The assigned Commissioner shall commence a second phase of this proceeding to review long-term strategies requiring formal review.

11. The Executive Director shall report at the Commission's first regularly scheduled meeting of each month on the status of the LifeLine program. Those reports, which should include information on any problems encountered, and the status of steps taken to implement program improvements, shall continue until the assigned Commissioner determines that they are no longer necessary.

12. Commission staff shall perform an audit of the Solix contract to ensure compliance with contract requirements. The audit shall commence within 30 days of the effective date of this order.

13. Commission Staff shall continue to hold regular meetings of the Implementation Working Group and the Marketing Working Group to discuss issues relating to the low response rates for the LifeLine certification and verification processes. Consumer groups shall be represented on both working groups.

14. The rulings made in the February 28, 2007 and March 28, 2007 assigned Commissioner's Rulings are confirmed, and adopted as orders of the Commission.
This order is effective today.

15. Solix is ordered to provide monthly database true-ups with participating carriers.

16. When the process of denying a Lifeline subscriber takes more than 90 days, carriers may either recover any amounts owed beyond the 90 days from the ULTs fund or collect such funds from the subscriber.

DOCKET OFFICE

PROOF OF SERVICE

I, Margaret L Tobias, the undersigned, hereby declare that, on April 23, 2007, caused a copy of the foregoing:

**COMMENTS OF COX CALIFORNIA TELCOM, LLC, DBA COX
COMMUNICATIONS, ON THE PROPOSED DECISION OF ALJ JONES: DECISION
ADOPTING STRATEGIES TO IMPROVE THE CALIFORNIA LIFELINE
CERTIFICATION AND VERIFICATION PROCESSES, AND REINSTATING
PORTIONS OF GENERAL ORDER 153**

in the above-captioned proceeding, to be served as follows:

- ☒ [X] Via hand-delivery and US Mail to the Assigned Commissioner
- ☒ [X] Via email service and US Mail to Administrative Law Judge
- ☒ [X] Via email service to all parties included in the attached service

Dated: April 23, 2007 at San Francisco, California.

/s/

Margaret L. Tobias

Proceeding: R0412001 - CPUC-ILECS, CLECS -
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Last changed: April 19, 2007

VIA EMAIL

jschnur@solixinc.com	sjy@cpuc.ca.gov	gail.long@tdstelecom.com
Kimberly.Kretchmer@frontiercorp.com	anna.kapetanakos@att.com	bettina@fones4all.com
rbuntrock@wcsr.com	greta.banks@att.com	esther.northrup@cox.com
owein@nclcdc.org	louie.decarlo@mci.com	gkountz@kermantelephone.com
sthomas@tminc.com	glenn@stoverlaw.net	julie@rhainc.com
Peter.M.Glass@xcelenergy.com	darcy.beal@att.com	nelsonya.causby@att.com
k.bailey@verizon.com	peter.hayes@att.com	marg@tobiaslo.com
kristie.flippo@twtelecom.com	enriqueg@lif.org	suzannetoller@dwt.com
jcompton@telscape.net	jclark@gmssr.com	cpuccases@pge.com
don.eachus@verizon.com	mschreiber@cwclaw.com	robertg@greenlining.org
jacque.lopez@verizon.com	smalllecs@cwclaw.com	cborn@czn.com
jesus.g.roman@verizon.com	john_gutierrez@cable.comcast.com	jchicoin@czn.com
lorraine.kocen@verizon.com	hongwong@apexglobalnet.com	ayy@cpuc.ca.gov
lbiddle@ferrisbritton.com	LaTanya.Linzie@cox.com	chr@cpuc.ca.gov
mshames@ucan.org	douglas.garrett@cox.com	dlw@cpuc.ca.gov
JYamagata@semprautilities.com	thaliag@greenlining.org	hcf@cpuc.ca.gov
ddixon@vycera.com	pucservice@dralegal.org	jhe@cpuc.ca.gov
finance@bluecasa.com	ejs@ejschneider.com	wbb@cpuc.ca.gov
dclark@kermantelephone.com	lmartin@pacwest.com	kdg@cpuc.ca.gov
lindab@steg.net	lorrie.bernstein@mossadams.com	kaj@cpuc.ca.gov
dand@ponderosatel.com	carlar@gvni.net	nxb@cpuc.ca.gov
cmailloux@turn.org	l.lupton@surewest.com	rh@cpuc.ca.gov
margarita.gutierrez@sfgov.org	joleen@cot.net	rwh@cpuc.ca.gov
rcosta@turn.org	jtlowers@sisqtel.net	smw@cpuc.ca.gov

US MAIL

SEAN WILSON
TALK.COM
12020 SUNRISE VALLEY, STE.250
RESTON VA

ERIN, DAWLEY
HORNIOS TELEPHONE COMPANY
PO BOX 5158
MADISON, WI 53705-0158

KARL ANDREW
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY SO, STE 100
ALLEN TX 75013-2789

MICHAEL MORCOM
VERIZON SELECT SERVICES, INC.
600 HIDDEN RIDGE, HQE01J016
IRVING TX 75038

MARY PHARO
VAR TEC TELECOM, INC.
1600 VICEROY DRIVE
DALLAS TX 75235

DAVID MORIARTY
MEDIA ONE/AT&T BROADBAND
550 CONTINENTAL BLVD.
EL SEGUNDO CA 90245

THALIA R. GIETZEN
VYCERA COMMUNICATION, INC.
12750 HIGH BLUFF DR., STE.200
SAN DIEGO CA 92130-2565

ERIC WOLFE
DUCOR TELEPHONE COMPANY
PO BOX 42230
BAKERSFIELD CA 93384-2230

JOSEPHINE WONG
APEX TELECOM INC.
PO BOX 1917
OAKLAND CA 94604

LORRIE BERNSTEIN
PINNACLES TELEPHONE COMPANY
340 LIVE OAK ROAD
PAICINES CA 95043-9998

YVONNE SMYTHE
CALAVERAS TELEPHONE COMPANY
PO BOX 37
COPPEROPOLIS CA 95228

ROSE CULLEN
THE VOLCANO TELEPHONE COMPANY
PO BOX 1070
PINE GROVE CA 95665-1070